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9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**

11 TRAVELERS PROPERTY
12 CASUALTY INSURANCE
13 COMPANY,

14 Plaintiff,

15 vs.
16

17 SUGAR BOWL CORPORATION, a
18 California Corporation, and DOES 1
19 to 20, INCLUSIVE,

20 Defendants.
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CASE NO.: 2:20-cv-0654-TLN-AC

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23 **STIPULATION MODIFYING JOINT**
24 **RULE 26 (f) DISCOVERY PLAN AND**
25 **PRE-TRIAL SCHEDULING ORDER;**
26 **ORDER**

27 Plaintiff TRAVELERS PROPERTY CASUALTY INSURANCE
28 COMPANY ("Plaintiff") and Defendant SUGAR BOWL CORPORATION
("Defendant") hereby respectfully submit the following Stipulation Modifying the
Court's April 1, 2020 Initial Pretrial Scheduling Order and the Joint Discovery
Plan previously submitted by the parties.

STIPULATION

WHEREAS, the Court issued and filed a Scheduling Order on April 1, 2020 (ECF No. 3);

WHEREAS, the parties entered a Joint Rule 26(f) Discovery Plan that was filed with the court on June 26, 2020;

WHEREAS, the Court's Scheduling Order, dated April 1, 2020, requires the parties to complete fact discovery by November 27, 2020, two hundred and forty (240) days from the date upon which the last answer may be filed;

WHEREAS, the Joint Rule 26(f) Discovery Plan provides for the completion of discovery on February 26, 2021 with discovery motions to be heard and depositions to be completed by no later than March 30, 2021;

WHEREAS, Defendant filed a Motion for Summary Judgment that was set to be heard by the court on March 4, 2021;

WHEREAS, Plaintiff and Defendant held off on various discovery pending the ruling on the Motion for Summary Judgment, but have been advised by the court that the court may take one year or longer to rule on the Motion for Summary Judgment;

WHEREAS, given the delays in securing a ruling on the Motion for Summary Judgment, the parties would like to continue the time for completing discovery, taking depositions and motions thereon;

WHEREAS, there were delays in completing discovery related to Covid restrictions and limitations;

WHEREAS, all parties hereto are in agreement on continuance of the time for conducting written discovery, taking depositions and motions thereon, and recognize that the stipulation of the parties is ineffective without an Order from the Court continuing discovery;

THEREFORE, the parties agree that good cause exists to extend all remaining deadlines in the Court's Scheduling Order, dated April 1, 2020 (ECF

No. 3) and in the Joint Rule 26 (f) Discovery Plan of the parties, to December 31, 2021.

IT IS SO STIPULATED.

DATED: September 8, 2021 **TRACHTMAN & TRACHTMAN, LLP**

By: /s/ Timothy M. Smith
Timothy M. Smith
Attorneys for Defendant
Sugar Bowl Corporation

DATED: September 9, 2021 **LAW OFFICES OF JOHN A. BIARD**

By: /s/ Susan E. Kirkgaard
Susan E. Kirkgaard
Attorneys for Plaintiff
Travelers Casualty Insurance Company

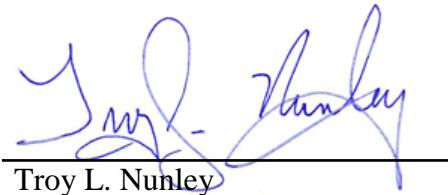
ORDER

Pursuant to Stipulation of all parties, and good cause appearing therefore,
the Court HEREBY ORDERS THAT:

1. The non-expert discovery cutoff is extended to December 31, 2021;
and
2. The deadline for completing all depositions is extended to December
31, 2021;

IT IS SO ORDERED.

DATED: September 22, 2021



Troy L. Nunley
United States District Judge